

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Conditional Major, Construction / Operating

Permit: F-07-014

AEP Industries, Inc.

123 Willamette Lane

Bowling Green, Kentucky 42101

April 17, 2007

Frough Sherwani, Reviewer

SOURCE ID: 21-227-00090

SOURCE A.I. #: 40031

ACTIVITY ID: APE20060001

**SOURCE DESCRIPTION:**

AEP Industries Inc. operates facility in Bowling Green, Warren County, Kentucky. The facility manufactures plastic bags under SIC 2643. APE Industries Inc. is currently operating under permit no F-95-020.

The source has four flexographic presses (press # 3, # 4, #5, # 10), two catalytic oxidizers, and a number of insignificant activities.

There are three additional presses (Press # 202, 207 and 208) which are not in operation. Those presses scheduled to be removed from the plant shortly.

On January 22, 2001, the Division received a renewal/name change application. The name change request from "Cello Bag Company Inc." to "AMCOR Flexibles Inc."

On January 19, 2003, the Division received another name change application. The name change request from "AMCOR Flexibles Inc." to "Mercury Plastics, Inc."

On November 16, 2006, the Division received name/owner change application. The name change request from "Mercury Plastics, Inc." to "AEP industries Inc."

**COMMENTS:**

**Type of control and efficiency:**

The source has two natural gas catalytic oxidizers (CO #1 and CO # 2). VOC emissions from presses # 3, #4, # 5 and #10 are vented to both oxidizers.

**Catalytic Oxidizer # 1**

To control VOC emissions from presses # 3, 4, 5 and 10

**Description:**

Destruction Efficiency:	99.4% tested on April 15, 2004
Rated capacity:	5.0 MMBtu/hr
Fuel usage:	Natural Gas
Construction Commenced:	August 1993

## **Catalytic Oxidizer # 2**

To control VOC emissions from presses # 3, 4, 5 and 10

### **Description:**

Destruction Efficiency:	96.7% tested on April 16, 2004
Rated capacity:	5.0 MMBtu/hr
Fuel usage:	Natural Gas
Construction Commenced:	September 1995

### **Emission factors and their source:**

AP – 42 5<sup>th</sup> edition, and mass balance (MSDS) are used for the emission factors for PM, VOC and HAPS.

### **APPLICABLE REGULATIONS:**

**401 KAR 52:030.** Federally-enforceable permits for nonmajor sources.

### **PRECLUDED REGULATIONS:**

**401 KAR 59:210.** New fabric, vinyl and paper surface coating operations.

The source has accepted a facility-wide limit on annual VOC emission of no more than 90.0 tons to preclude the applicability of 401 KAR 59:210. The actual VOC emissions shall be calculated based on 12-month rolling total.

**401 KAR 59:212.** New graphic arts facilities using rotogravure and flexography

The source has accepted a facility-wide limit on annual VOC emission of no more than 90.0 tons to preclude the applicability of 401 KAR 59:212. The actual VOC emissions shall be calculated based on 12-month rolling total.

## **EMISSIONS AND OPERATING CAPS DESCRIPTIONS:**

The source has accepted a facility-wide cap on annual VOC emissions of no more than 90.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by a combination of record keeping, material balance and the operation of the oxidizers specified in the terms and conditions of the permit.

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.